

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA  
Criminal No. 23-82 (NEB/DTS)

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	<b>GOVERNMENT'S POSITION</b>
v.	)	<b>REGARDING SENTENCING</b>
	)	
SHARON ROSS,	)	
	)	
Defendant.	)	

The United States of America, by and through its attorneys, Lisa D. Kirkpatrick, Acting United States Attorney for the District of Minnesota, and Joseph H. Thompson, Harry M. Jacobs, Matthew S. Ebert, and Daniel W. Bobier, Assistant United States Attorneys, submits the following sentencing memorandum and respectfully requests that the Court impose a sentence of 46 months in prison.

**I. BACKGROUND**


**A. The Fraudulent House of Refuge Food Sites**

Ross was the executive director of House of Refuge Twin Cities, a non-profit company located in St. Paul, Minnesota. Ross enrolled House of Refuge in the Federal Child Nutrition Program under the sponsorship of first Feeding Our Future and, later, Partners in Nutrition. Ross claimed that House of Refuge operated food distribution sites at a dozen locations throughout the Twin Cities. In April 2021, Ross attempted to enroll House of Refuge in the federal child nutrition program under the sponsorship of Feeding Our Future. When MDE did not immediately process her application, Ross reached out to state and local politicians seeking to pressure MDE.

Ross also sent letters to MDE insisting that House of Refuge was a “vital” source of nutritious meals to a community that had “experienced great hardships during the pandemic and civil unrest that affected us during 2020.



After enrolling in the federal child nutrition program, Ross claimed—falsely—that House of Refuge was serving thousands of meals per day at the various House of Refuge sites. In support of these claims, Ross submitted fraudulent meal count forms purporting to show that the various House of Refuge sites were serving meals to thousands of children per day.

 **FEEDING OUR FUTURE**

### SUMMER MEAL COUNTS – CLICKER

Sponsor	FEEDING OUR FUTURE		Email	aimee@feedingourfuturemn.org		Phone	612.345.4922	
Site	HOUSE OF REFUGE OUTREACH		Supervisor			Week of	7/25/2021	
Meal Type	<input checked="" type="checkbox"/> BREAKFAST		<input type="checkbox"/> LUNCH					
Available Meals	Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	TOTAL
Number of meals received/prepared	3100	3100	3100	3200	3100	3100	3200	21900
Number of meals from yesterday	0	0	0	0	0	0	0	0
Meal Counts	Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	TOTAL
Number of firsts served to children	3000	3000	3000	3090	3000	3000	3090	21180
Number of second meals served to children (not reimbursed)	0	0	0	0	0	0	0	0
Number of meals served to program adults (not reimbursed)	85	79	81	80	81	79	80	565
Number of meals served to non-program adults (not reimbursed)	12	11	9	25	9	11	25	102
Number of children requesting meals of food is gone	0	0	0	0	0	0	0	0
Food	Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	TOTAL
FOOD TEMPERATURE	35°F	35°F	35°F	35°F	35°F	35°F	35°F	
Number of non-reimbursable, incomplete or damaged meals	3	7	8	5	8	7	5	43
Number of leftover meals	0	3	1	0	1	3	0	8
Initials of person taking daily meal count certifying that the information is true and accurate	AS	AS	AS	AS	AS	AS	AS	
Signature: <i>Sharon Rose</i> SITE SUPERVISOR: By signing, I certify that the above information is true and accurate.      Date: 7/31/2021								

Ross claimed that House of Refuge served nearly 900,000 meals from September 2021 through February 2022—including more than 300,000 meals during the month of September 2021 alone.

### Total Meals Served in September 2021

Site	After School Snack	Supper	No. of Days Served
Ethiopian Orthodox Church	25,200	25,200	21
Great is Thy Faithfulness COGIC	28,000	28,000	21
Greater Mt. Nebo	12,600	12,600	21
House of Refuge Outreach	44,073	44,073	21
Iglesia Evangelica Apostoles 7 Profetas USA	27,300	27,300	21
Iglesia Evangelica AyP USA	17,535	17,535	21
Iglesia Pentecostes Israel	17,535	17,535	21
Iglesia Profetica Monte Divino	36,400	36,400	21
Miercoles y Viernes	17,535	17,535	21
Mt. Olivet Missionary Baptist Church	16,800	16,800	21
New Hope Baptist Church	44,073	44,073	21
True Foundation COGIC	10,500	10,500	21

<b>Total Meals Served</b>	<b>297,551</b>	<b>297,551</b>
<b>Avg. No. of Meals Served Per Day</b>	<b>14,169</b>	<b>14,169</b>

Ross purported to run many of the House of Refuge food sites out of area churches. For example, Ross claimed to have served 36,400 meals at Iglesia Profetica Monte Divino in September 2021. When interviewed by federal agents, the lead pastor at the church said, “that is a lie” and that his church had never participated in the food program. Similarly, Ross claimed that House of Refuge served 27,300 meals at Iglesia Evangelica Apostoles y Profetas in September 2021. The head pastor said the church has never participated in the food program and that no meals were distributed at his church. Ross also claimed that in September 2021 House of Refuge served 17,535 meals at Iglesia Evangelica AyP church, which rents out space at a Lutheran church in Maple Grove. But, in reality, Iglesia Evangelica AyP had a 25- to 30-person congregation and did not participate in the food program or distribute food.

**B. House of Refuge's Fake Home Meal Deliveries**

As part of the scheme, Ross also claimed that House of Refuge was doing home delivery of meals to families and children. In support of these claims, Ross created "home meal delivery authorization" forms purportedly signed by the individuals to whom House of Refuge delivered food. For example, Ross created a home meal delivery authorization form claiming that Maria G. of Osseo, Minnesota, authorized House of Refuge to deliver meals to her five children.

HOME MEAL DELIVERY AUTHORIZATION						
DURING THE COVID-19 SCHOOL CLOSURE PROGRAMS HAVE THE OPTION TO DELIVER MEALS TO THE HOMES OF YOUTH 18 AND YOUNGER WITH SIGNED PARENTAL / GUARDIAN CONSENT						
<b>PROGRAM INFORMATION</b>						
Program Name	House Of Refuge Outreach					
Program Address	520 Atwater Circle St. Paul. MN					
Phone Number	952-██████████	email	sross@hortch.org			
<b>HOUSEHOLD INFORMATION</b>						
Address	██████████					
City	5 OSSEO	State	MN	Zip	55369	
Number of Children	5	Meals Requested				
<b>CONSENT</b>						
I give consent to the program list above to deliver meals to my home during the COVID-19 school closure. I understand that household contact information may be shared with school staff, volunteer deliverers or private delivery vendors. I also give consent for meals to be left if no one is home at the time of delivery.						
By signing below, you are authorizing the release of your information to the organization and individuals responsible for meal delivery. Please notify the program to terminate this authorization or to make changes.						
<b>SIGNATURE</b>						
Printed Name	MARIA G. ██████████					
Signature	MARIA G. ██████████			Date	08/5/21	

When interviewed, however, Maria G. said she did not have any children and had never had meals delivered to her residence by House of Refuge. Indeed, Maria G. had never heard of House of Refuge or Ross. Maria G. said that the signature on the home meal delivery authorization form was not hers.

Ross also created a home meal deliver authorization purporting to show that House of Refuge delivered food to the home of Kelly A. and her two minor children. This was not true. While Kelly A. had gone to the food shelf several times to get groceries, she never registered her children to receive meals from House of Refuge. Kelly A. said her children did not receive home meal delivery and that she had not authorized anyone to use her children's names to be reimbursed for meals as part of the federal child nutrition program. She said her children got some free meals from the school they were attending, but it had nothing to do with House of Refuge.

**C. House of Refuge's Fake Attendance Rosters**

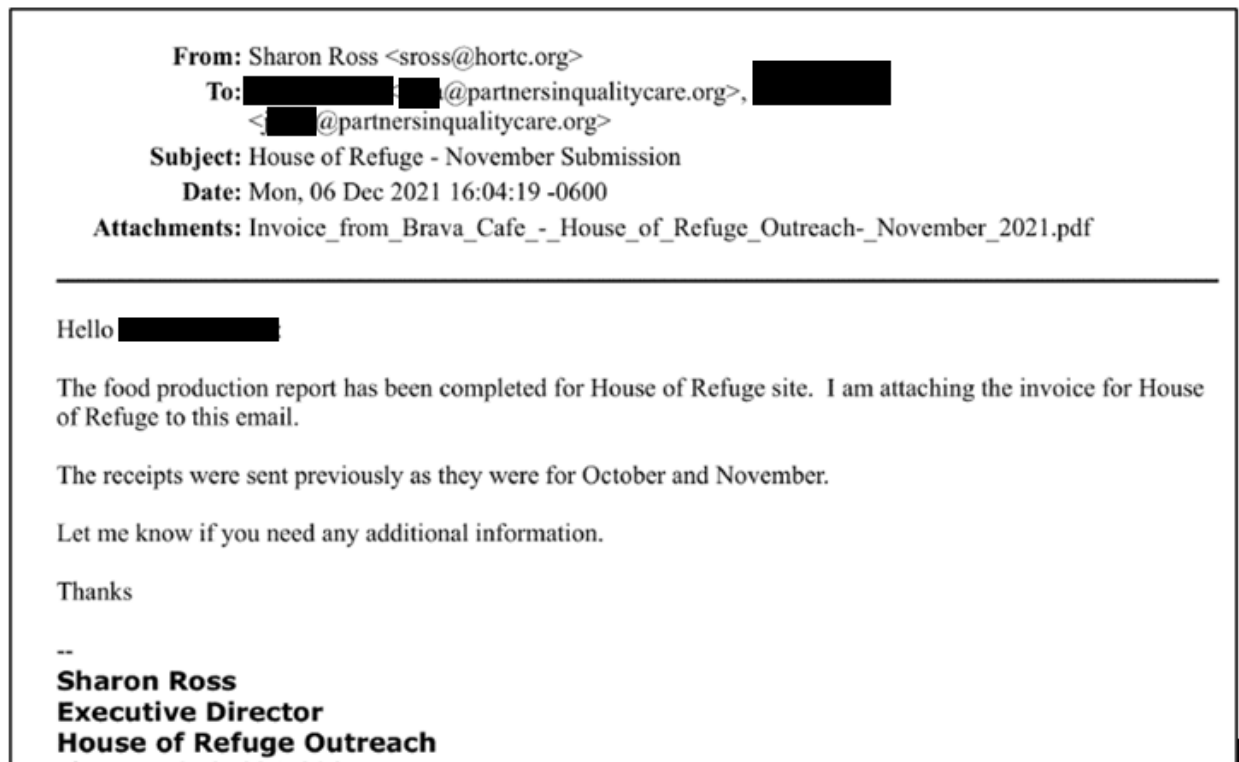
In addition to the fake meal counts, Ross also created and submitted fraudulent attendance rosters in support of her fraudulent claims. These rosters purported to list the names of children who received free food at House of Refuge's food sites. A comparison of those rosters to the full list of schools attending school in the local school district seems to show that most, if not all, of the names were fake.

**D. Ross worked with a food vendor, Brava Café, run by Ross's co-defendant, Hanna Marekegn**

Ross claimed that the food was being served by a food vendor called Brava Café, which was a restaurant in Minneapolis run by Ross's co-defendant, Hanna



Marekegn.<sup>1</sup> Ross and Marekegn created and submitted fraudulent invoices purporting to show that House of Refuge was purchasing hundreds of thousands of dollars in food from Brava Café each. For example, on December 6, 2021, Ross submitted to Partners in Nutrition an invoice purporting to show—falsely—that House of Refuge had purchased more than \$660,000 worth of food from Brava Café in November 2021.



<sup>1</sup> Marekegn has pled guilty for her role in the fraud scheme. *See United States v. Hanna Marekegn*, 22 CR 236 (NEB).

Brava Café 2021 Hennepin Avenue E Minneapolis, MN 55413		INVOICE		6	
		Invoice Date: December 6, 2021			
BILL TO:		DUE DATE		TOTAL DUE	
House of Refuge		Upon Receipt		\$663,816.30	
Date	Quantity	Item	Unit Price	# of Days	Total Price
11/01/21	1677	Snack	\$0.41	7.00	\$4,812.99
	1677	Supper	\$1.49	7.00	\$17,491.11
11/02/21	1677	Snack	\$0.41	7.00	\$4,812.99
	1677	Supper	\$1.49	7.00	\$17,491.11
11/03/21	1660	Snack	\$0.41	7.00	\$4,764.20
	1660	Supper	\$1.49	7.00	\$17,313.80
11/04/21	1660	Snack	\$0.41	7.00	\$4,764.20
	1660	Supper	\$1.49	7.00	\$17,313.80
11/05/21	1660	Snack	\$0.41	7.00	\$4,764.20
	1660	Supper	\$1.49	7.00	\$17,313.80
11/06/21	1660	Snack	\$0.41	7.00	\$4,764.20
	1660	Supper	\$1.49	7.00	\$17,313.80
11/07/21	1660	Snack	\$0.41	7.00	\$4,764.20
	1660	Supper	\$1.49	7.00	\$17,313.80
11/08/21	1660	Snack	\$0.41	7.00	\$4,764.20
	1660	Supper	\$1.49	7.00	\$17,313.80
11/09/21	1660	Snack	\$0.41	7.00	\$4,764.20
	1660	Supper	\$1.49	7.00	\$17,313.80
11/10/21	1658	Snack	\$0.41	7.00	\$4,758.46
	1658	Supper	\$1.49	7.00	\$17,292.94

	1666	Supper	\$1.49	7.00	\$17,376.38
11/20/21	1666	Snack	\$0.41	7.00	\$4,781.42
	1666	Supper	\$1.49	7.00	\$17,376.38
11/21/21	1666	Snack	\$0.41	7.00	\$4,781.42
	1666	Supper	\$1.49	7.00	\$17,376.38
11/22/21	1666	Snack	\$0.41	7.00	\$4,781.42
	1666	Supper	\$1.49	7.00	\$17,376.38
11/23/21	1666	Snack	\$0.41	7.00	\$4,781.42
	1666	Supper	\$1.49	7.00	\$17,376.38
11/24/21	1667	Snack	\$0.41	7.00	\$4,784.29
	1667	Supper	\$1.49	7.00	\$17,386.81
11/25/21	1667	Snack	\$0.41	7.00	\$4,784.29
	1667	Supper	\$1.49	7.00	\$17,386.81
11/26/21	1667	Snack	\$0.41	7.00	\$4,784.29
	1667	Supper	\$1.49	7.00	\$17,386.81
11/27/21	1667	Snack	\$0.41	7.00	\$4,784.29
	1667	Supper	\$1.49	7.00	\$17,386.81
11/28/21	1667	Snack	\$0.41	7.00	\$4,784.29
	1667	Supper	\$1.49	7.00	\$17,386.81
11/29/21	1667	Snack	\$0.41	7.00	\$4,784.29
	1667	Supper	\$1.49	7.00	\$17,386.81
11/30/21	1667	Snack	\$0.41	7.00	\$4,784.29
	1667	Supper	\$1.49	7.00	\$17,386.81
Total					\$663,816.30

Based on these fraudulent claims, Ross received approximately \$2,434,360 in federal child nutrition programs funds for meals purportedly served to children at the House of Refuge sites. Ross split this money with Marakegn through her fake food vendor company, Brava Café.

#### **E. Ross distributed much of the fraud scheme to her family**

Ross distributed her portions of the fraud to her family. Ross and her family received more than \$900,000 in federal child nutrition program funds over a three-month period from November 2021 to January 2022.

During this period, Ross distributed hundreds of thousands of dollars in fraud proceeds among her family by giving them no-show jobs and putting them on the House of Refuge payroll. Ross claimed that she and her family members were all working 12 hours per day, seven days a week.



**From:** Sharon Ross <sross@hortc.org>  
**To:** Kara Lomen <kara@partnersinqualitycare.org>  
**Subject:** Re: Expenses for House of Refuge Outreach  
**Date:** Thu, 14 Oct 2021 12:17:28 -0500  
**Attachments:** Employee\_List.pdf  
**Inline-Images:** image001.png

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Hello Kara:

I am attaching the spreadsheet for the salary of the staff. Everyone is working 12 hour days for 7 days a week, so that is how I calculated. Please let me know if I need to change anything. This is my first time (as you know) and I want to make sure I am doing it correctly.

I am waiting for Brava to resend their invoice and I will send it to you.

Thanks

One of Sharon Ross's family members on the House of Refuge payroll was D.R. Like all other House of Refuge employees, Ross claimed that D.R. worked 12 hours a day, seven days a week. Ross paid him \$35/hour. This was not true. In reality, D.R. received at-home personal care assistant (PCA) care due to a disability. Indeed, Ross had guardianship over D.R. due to his disability. And, at the same time that Ross claimed D.R. was working 12 hours a day, seven days a week at House of Refuge, Ross submitted time sheets showing that D.R. was receiving between 5 and 9 hours a day in PCA services.

From: Sharon Ross <sross@hortc.org>  
 To: Nick W [REDACTED] mehealth.org>  
 Cc: [REDACTED]

Subject: Re: Time Sheet

Date: Tue, 16 Nov 2021 14:24:58 -0600

Attachments: Maurice [REDACTED] 1132021.pdf

Hello:

Here is Maurice C [REDACTED]'s timesheets.

Thanks

Office # (952) [REDACTED] **TIME SHEET IHS** Fax # (952) [REDACTED] *Per Comp*

Client: D [REDACTED] MA#: [REDACTED] PCA: MAURICE G [REDACTED] MHCP#: [REDACTED]

(NOTE: You cannot bill while client is in the hospital. Put EXACT DATES and TIMES of entering and coming out of hospital.)

PLACE SERVICE PROVIDED: Home ☐ Work ☐ Vacation ☐ School ☐ Hospital ☐ Other ☐

Dates of Service:

DAY	DD/MM/YY	TIME IN	TIME OUT	TIME IN	TIME OUT	TOTAL HRS
1. Thursday	10/24/21	6:00 AM	4:00 PM			8
2. Friday	10/29/21	6:00 AM	4:00 PM			8
3. Saturday	10/30/21	6:00 AM	2:00 PM			6
4. Sunday	10/31/21	8:00 AM	2:00 PM			6
5. Monday	11/01/21	6:00 AM	3:00 PM			9
6. Tuesday	11/02/21	6:00 AM	3:00 PM			9
7. Wednesday	11/03/21	6:00 AM	3:00 PM			9
8. Thursday	11/04/21	6:00 AM	3:00 PM			9
9. Friday	11/05/21	10:00 AM	3:00 PM			5
10. Saturday	11/06/21	10:00 AM	3:00 PM			5
11. Sunday	11/07/21	8:00 AM	1:00 PM			5
12. Monday	11/08/21	5:00 AM	2:00 PM			9
13. Tuesday	11/09/21	5:00 AM	2:00 PM			9
14. Wednesday	11/10/21	4:00 AM	1:00 PM			9

Note: This is document is not suited and will not be used for Shared Care.  
 \*After the PCA has documented his/her time and activity, the recipient must draw a line through any dates and time he/she did not receive services from the PCA.

PLEASE note any **changes in ability, medications, or request in assistance** below: \_\_\_\_\_

TOTAL HRS 106

**F. Ross used most of the rest of the fraud proceeds to fund her lifestyle**

Ross used the rest of the money to fund her lifestyle, including travel and real estate. For example, the day after receiving \$400,000 from Partners in Nutrition in

December 2021, Ross: (1) reached out to Feldman Imports about buying a Mercedes; (2) reached out a plastic surgeon in Beverly Hills about plastic surgery procedures; (3) booked a suite at a Timberwolves-Lakes game for her and a dozen friends; and (4) booked first-class tickets to Orlando, Florida, and purchased \$500/day VIP passes to Universal Studios for her and her family.<sup>2</sup> Ross also used \$120,600 in federal child nutrition program funds to purchase a home in Willernie, Minnesota.

Despite her fraud, Ross continued to fraudulently hold herself out as a charitable leader even after the investigation into the federal child nutrition program became public. Several months after the government executed search warrants in January 2022, Ross gave an TV interview in which she complained that MDE owed House of Refuge more than \$2 million in federal child nutrition program reimbursements and that it had been forced to end its meals program for school-aged children due to the criminal investigation. Ross explained, “We were serving 3,000 children every week, and we had to stop doing that at the end of February. We just could not continue financially to do it. So March, April and all of this part of May, we have not been feeding the children from the actual programs. So those kids have been

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<sup>2</sup> Ross also traveled to Dubai. She told the probation office that her Dubai trip was paid for by another employer, Global Medical Services. PSR ¶95, A.2.

In November 2022, the owners of Global Medical Services, Khemwattie Singh and Neeraj Chepuri, were indicted and charged with defrauding investors who had purchased the company’s accounts receivable at a discount pursuant to a factoring agreement. *See United States v. Singh & Chepuri*, 22 CR 308 (PJS/JFD). They later collected the receivables, but rather than turn them over to their investors pursuant to the factoring agreement, Singh and Chepuri kept the funds from themselves, thus defrauding their investors who were entitled to the receivables under the terms of the factoring agreement. Both Singh and Chepuri pled guilty.

going without.” See “St. Paul food shelf struggles to keep up with children’s meal programs,” KSTP5 (May 15, 2022), available at <https://kstp.com/kstp-news/top-news/st-paul-food-shelf-struggles-to-keep-up-with-childrens-meal-programs/> (last accessed Jan. 23, 2025). Ross added, “It’s devastating to know that we were doing a program that was benefiting so many families so that their children could eat a good, nutritious meal every night.”

None of this was true. What was devastating to Ross was that she would no longer be able to enrich herself at taxpayer expense.

## **II. THE GUIDELINES RANGE**

### **A. The Base Offense Level and Loss Amount**

The base offense level is 7 pursuant to Guidelines § 2B1.1(a)(1). PSR ¶50. The base offense level is increased 16 levels pursuant to Guidelines § 2B1.1(1)(I) because the loss was more than \$1.5 million but less than \$3.5 million. PSR ¶51. As explained in its objections to the PSR, the government is not seeking offense level enhancements under Guidelines §§ 2B1.1(b)(9)(A) or 2B1.1(b)(12) because those enhancements were not contemplated in the plea agreement. PSR at A.1-A.2. The offense level is reduced 3 levels pursuant to Guidelines § 3E1.1(a) and (b) because Ross accepted responsibility in a timely manner. PSR ¶¶59-60. Accordingly, the government believes Ross’s offense level should be 20.

### **B. Criminal History**

Ross has a prior conviction for theft by swindle. According to the PSR, while working as an administrative assistant at a medical office in Arden Hills, Minnesota, Ross submitted fraudulent expense reports for reimbursement and made

unauthorized charges on her employer's credit card. PSR ¶65. In all, Ross fraudulently obtained more than \$70,000 from her employer over a 15-month period. *Id.* After pleading guilty in 2016, Ross was sentenced to probation. *Id.* Although Ross committed the instance offense while on probation, she does not receive any additional criminal history points because she has a total of fewer than 7 criminal history points. PSR ¶67. Accordingly, Ross has 1 criminal history point and falls in criminal history category I. PSR ¶68.

### **C. Advisory Guidelines Range**

An offense level of 20 and criminal history level I results in an advisory Guidelines range of 37 to 46 months in prison.

### **III. GOVERNMENT'S SENTENCING RECOMMENDATION**

Based on a review of the § 3553(a) factors, the government recommends that the Court impose a sentence of 46 months in prison.

Ross participated in one of the largest fraud schemes in the history of the District of Minnesota, and the single largest Covid-19 fraud scheme in the country. She took advantage of a once-in-a-century global pandemic to enrich herself. She abused and took advantage of a child nutrition program designed to ensure that no child goes without food. The cynicism of her crime is staggering. Her crime has eroded trust in the government and raised questions about the sustainability of our state government. Her crime undermined and endangered legitimate nonprofit organizations that rely on donations to carry out actual charitable work.

In recent years, Minnesota has been plagued by unprecedented levels of fraud—the likes of which are not seen elsewhere around the country. But fraud is a

choice. Ross did not act out of financial hardship or need. She acted out of sheer greed. And she did so, presumably, because she thought she could get away with it.

This Court must send a message that fraud of this nature is no longer acceptable in Minnesota.

Taking into consideration the Sentencing Guidelines, as well as all of the other factors required to be considered under § 3553(a), the government respectfully suggests that a sentence of 46 months in prison appropriately reflects the seriousness of Ross's crime, promotes respect for the law, provides a just punishment, and creates adequate deterrence not only to Ross, but to all other individuals who take advantage of the state and believe that they are above the law.

#### IV. CONCLUSION

For the reasons stated above, the government respectfully requests that the Court impose a sentence of 46 months in prison.

Respectfully Submitted,

Dated: January 24, 2025

LISA D. KIRKPATRICK  
Acting United States Attorney

/s/ Joseph H. Thompson  
BY: JOSEPH H. THOMPSON  
HARRY M. JACOBS  
MATTHEW S. EBERT  
DANIEL W. BOBIER  
Assistant U.S. Attorneys